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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9 **EASTERN DIVISION – RIVERSIDE**

10 SAVE OUR FOREST ASSOCIATION,
INC.,

11 Plaintiff,

12 vs.

13 UNITED STATES FOREST SERVICE,
et al.,

14 Defendants.
15

Case No.: 5:24-cv-01336-JGB-DTB

**REQUEST FOR LEAVE TO
APPEAR REMOTELY**

Date: August 4, 2025

Time: 9:00 a.m.

Judge: Hon. Jesus G. Bernal

Dept: Riverside, Courtroom 1

Action Filed: June 25, 2024

16 Counsel for Plaintiff SAVE OUR FOREST ASSOCIATION, INC. (“SOFA”)
17 hereby respectfully requests leave to appear remotely at the hearing in the above-
18 captioned matter, scheduled for August 4, 2025, at 9:00 a.m. before the Honorable
19 Jesus G. Bernal, in accordance with his Standing Order of March 24, 2016 (“Standing
20 Order”).
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1 The Yuhaaviatam of San Manuel Nation (“Nation”) filed its Motion to
2 Intervene (ECF 38) in this matter on March 6, 2025. The Nation seeks to intervene
3 for the sole purpose of seeking dismissal of the case. *Id.* The Motion to Intervene has
4 been fully briefed and awaits only a hearing. The Parties earlier agreed to continue
5 the hearing on the Motion to Intervene upon request of counsel for the Nation from
6 June 9, 2025, until July 7, 2025. (ECF 50) Upon its own initiative, the Court then
7 moved the hearing date to August 4, 2025. (ECF 59) Plaintiff, who has not previously
8 requested any delay to the hearing date on the Motion to Intervene, requested of
9 counsel for Defendant and the Nation that the hearing be moved to accommodate a
10 prior-planned vacation of counsel in Upstate New York. (ECF 60, 61) Counsel for
11 Plaintiff suggested as alternative dates August 18, August 25, September 8,
12 September 15, September 22, and September 29. Counsel for the Nation identified
13 only September 15, 2025, as available, to which the Defendants also agreed.
14 (Doughty Decl., ECF 65-1, ¶¶1-3; ECF 60, 61). Also on July 14, 2025, Counsel for
15 Plaintiff SOFA and Defendants filed a Stipulation for Proposed Briefing Schedule
16 (ECF No. 62).

17 On July 15, 2025, Counsel for the Nation, which is not a party to this action,
18 filed an objection to the parties’ stipulated proposed briefing schedule and also
19 withdrew its stipulated consent to move the August 4, 2025, hearing date on the
20 Nation’s Motion to Intervene to September (ECF 63). Both counsel for the Federal
21

1 Defendants and SOFA filed replies to the Nation’s opposition to the parties’
2 stipulated briefing schedule and to the withdrawal of the stipulated change of the
3 hearing date to September, 2025—a full 6 months prior to when the substance of this
4 case could earliest be briefed under the proposed scheduling order (ECF 64, 65).

5 Counsel for the Nation filed a request to appear remotely at the August 4, 2025,
6 hearing upon the grounds that Counsel is located in Colorado (ECF 66).

7 No orders have been issued on either the stipulation to move the August 4,
8 2025, hearing date on the Motion to Intervene or on the stipulated substantive
9 briefing schedule.

10 The Court may permit a party to appear and provide testimony via remote
11 means, upon advance request and for good cause. Standing Order, §16. Counsel for
12 Plaintiff has a pre-planned family trip to Upstate New York beginning July 27, 2025,
13 through the evening of August 10, 2025. (Doughty Decl. at ¶ 5). This is a family
14 vacation. These travel arrangements were scheduled prior to the Court’s July 2, 2025,
15 order continuing the hearing on the Tribe’s motion to August 4, 2025. (Doughty
16 Decl., ECF 65-1 ¶¶ 1, 2). Accordingly, counsel for SOFA requests approval to appear
17 remotely in this matter at the hearing on August 4, 2025, at 9:00 a.m., should the
18 Court decline to continue the hearing date to September 15, 2025—when all counsel
19 are available.

1 Dated: July 25, 2025

Respectfully Submitted,

2 By: /s/ Rachel S. Doughty

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10 SAVE OUR FOREST ASSOCIATION,
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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2025, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Central District of California using the CM/ECF system, which will send notification of this filing to the attorneys of record.

/s/ Jessica San Luis
Jessica San Luis